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Attorneys for Plaintiff
GREEN S.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GREEN S.A.,

Plaintiff,

ECF CASE

07 Civ. 5591 (LAP)

- against -

BIN JOHAR GENERAL TRADING LLC. also
known as BIN JOHAR TRADING LLC and
CAVALIER ENTERPRISE, INC.,

Defendants.
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REPLY TO BIN JOHAR GENERAL TRADING LLC'S COUNTERCLAIM

Plaintiff GREEN S.A. ("GREEN"), by its attorneys, Lyons & Flood, LLP, as and for its
Reply to defendant BIN JOHAR GENERAL TRADING LLC., also known as BIN JOHAR
TRADING LLC's ("BIN JOHAR") Counterclaim alleges upon information and belief as
follows:

1. Paragraph 22 of BIN JOHAR's Verified Answer and Counterclaim does not
require a reply.
2. Admits that BIN JOHAR loaded a quantity of gas oil aboard the M/V OLYMPIC
PRIDE on or about March 28, 2006, at the Jebel Ali Port in Dubai, U.A.E., for carriage to Tanga,
Tanzania, but except as so specifically admitted, denies the remaining allegations contained in
paragraph 23 of BIN JOHAR's Verified Answer and Counterclaim.

3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 24 of BIN JOHAR's Verified Answer and Counterclaim.

4. Admits that on or about May 10, 2006, the vessel discharged a cargo of gas oil at Tanga, Tanzania, but except as so specifically admitted herein, denies the remaining allegations of paragraph 25 of BIN JOHAR's Verified Answer and Counterclaim.

5. Denies the allegations contained in paragraphs 26, 27, and 28 of BIN JOHAR's Verified Answer and Counterclaim.

FIRST AFFIRMATIVE DEFENSE

6. Defendant BIN JOHAR's Counterclaim fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

7. Plaintiff repeats and realleges each and every allegation contained in the Second Amended Verified Complaint filed herein.

THIRD AFFIRMATIVE DEFENSE

8. Defendant BIN JOHAR's Counterclaim is subject to London arbitration and, therefore, the Counterclaim should be stayed pending London arbitration.

WHEREFORE, plaintiff GREEN prays that:

a. judgment be entered by this Court against BIN JOHAR and in favor of plaintiff, dismissing BIN JOHAR's Counterclaim; and

b. judgment be entered by this Court in favor of plaintiff for such other, further, and different relief as this Court may deem just and proper.

Dated: November 26, 2007

LYONS & FLOOD, LLP
Attorneys for plaintiff
GREEN S.A.

By: Kirk M. Lyons
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CERTIFICATE OF SERVICE

Kirk M. Lyons, an attorney duly admitted to practice before this Honorable Court, affirms on this 26th day of November 2007, I served true copies of the foregoing, by first class mail, postage pre-paid to:

BURKE & PARSONS
Attorneys for Defendant
BIN JOHAR GENERAL TRADING LLC
100 Park Avenue
New York, NY 10017

J. DAVID O'BRIEN, ESQ.
Attorney for Defendant
CAVALIER ENTERPRISE, INC.
20 Vesey Street, Suite 1210
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Kirk M. Lyons